Case No: 18-cv-05448

MOTION FOR LEAVE TO WITHDRAW

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK
TING QIU QIU,
JIAN WEI DENG,
YU BO SU,
ZHAOBANG BAI, and
SHAOHONG ZENG
on their own behalf and on behalf of others similarly
situated
Plaintiffs,
V.
SHANGHAI CUISINE, INC.
d/b/a Shanghai Cuisine Bar & Restaurant;
R & M CENTURY, INC.
d/b/a Shanghai Cuisine Bar & Restaurant;
JOHN DOE CORPORATION
JONATHAN HO,
NA SUN,
JIJIE HONG,
WING JING LAU,
JOSEPHINE FENG, and
CHENWEN HO
Defendants.

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COMES NOW Craig L. Uhrich, on behalf of Upshaw PLLC, and requests leave of the Court for Craig Lee Uhrich, Erik James Dykema, and Upshaw PLLC to withdraw as counsel of record in this matter. In support thereof, below-signed counsel states that withdrawal is necessary because, *inter alia*, communications with his clients had deteriorated to the point that he can no longer adequately represent his clients.¹

The client's representative in this matter has consented to the withdrawal. Below-signed counsel has informed the client representative of the client's ongoing obligations and upcoming deadlines in this matter.

Below-signed counsel contacted the offices of Plaintiffs' attorneys on June 26 to notify Plaintiffs' counsel of the need to withdraw and to determine whether or not the motion would be unopposed. The person who answered the telephone indicated that Plaintiffs' counsel was unavailable, but that they could be reached by email. On that same day, below-signed counsel

¹ Counsel is seeking leave to withdraw in the other three cases in which counsel presents the same clients. Opposing counsel in those matters has consented to the withdrawal.

emailed both of Plaintiffs' attorneys who have appeared in this case. No response has been received. Therefore, it appears reasonable to assume that this motion is opposed in this matter.

WHEREFORE, premises considers, below-signed counsel respectfully requests that the Court enter an Order allowing Craig Lee Uhrich, Erik James Dykema, and Upshaw PLLC to withdraw as counsel of record in this matter.

Dated: July 2, 2019

/s/ Craig L. Uhrich

Upshaw PLLC By: Craig L. Uhrich, Esq. 222 Center Avenue Oakley, KS 67748 (785) 671-1237 craig.uhrich@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2019, I filed the above and forgoing document through the Court's electronic filing system, which will provide service on all counsel of record.

/s/Craig L. Uhrich/

Craig L. Uhrich